

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/ACTIVITY DATA:

Program/Activity Number: (TBD _____ - _____)

Country/Region: West Bank and Gaza _____

Program/Activity Title: Building Foundations Indefinite Delivery Indefinite Quantity Contract and Architecture and Engineering Contract

Project/Activity Implementation: October 1, 2016-September 30, 2023

LOP Amount: \$650,000,000

Prepared By: Orna Dickman Current Date: May 23, 2016

Expiration Date: September 30, 2023

Amendment (Y/N): N If "yes", File name & date of original IEE/RCE _____;

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

Negative Determination: x Negative Determination with conditions: x

Positive Determination: x Deferral: _____

SUMMARY OF FINDINGS AND RECOMMENDED THRESHOLD DECISION

USAID/West Bank and Gaza's Building Foundations Indefinite Delivery Indefinite Quantity Contract and Architecture and Engineering Services Contract is a seven year program that will involve construction and rehabilitation of physical infrastructure in the West Bank and Gaza. The program will consist of two phases: 1) Planning, design, and construction management services will be provided by a U.S. engineering firm that will implement the Architecture and Engineering Services Indefinite Delivery Indefinite Quantity Contract (A&E Services IDIQ), and 2) Construction activities implemented by construction contractors. Phase 1 activities include site surveys, feasibility studies, geotechnical investigations, master planning, conceptual designs, environmental studies, project reports, technical training, institutional capacity building, preparation of specifications for commodities/equipment procurement, final designs, construction tendering documents, requesting project permits, capacity building, and liaising and coordinating with Palestinian and Israeli officials and other donor representatives. Phase 2 activities include construction activities to implement the engineering designs. Phase 1 is not

expected to have a direct adverse impact on the environment. Phase 2 activities will be identified during the implementation of Phase 1.

A Categorical Exclusion is recommended for the planning and design phase (activities under the A&E firm) pursuant to 22 CFR 216.2 (c)(1)(i) – “The action does not have an effect on the natural or physical environment.”

An Environmental Assessment Screening Process (EASP) shall be conducted for each construction activity to determine what environmental consequences might occur and to develop the appropriate mitigation and control measures. Pursuant to 22 CFR 216.3 (a)(2)(iii), a Negative Determination with Conditions is recommended for all construction activities determined to have no “significant” effect on the natural or physical environment. A Positive Determination is recommended for construction activities which are large-scale or on new land (undeveloped land), and for activities determined to have a “significant” effect on the environment after conducting the EASP. A Scoping Statement and a detailed Environmental Assessment shall be prepared and approved by the Bureau Environmental Officer (BEO) prior to any construction.

Revisions

Pursuant to 22 CFR 216.3 (a)(9), if new information becomes available which indicates that any of the proposed actions to be funded by this activity might be “major” and their results “significant,” the threshold decision for those actions listed above will be reviewed and revised by the Mission Environmental Officer, and an environmental assessment prepared as appropriate.

PROGRAM/ACTIVITY DATA

Country Code-DO: 294 "Economic Growth and Infrastructure"
Country/Region: West Bank and Gaza
Project/Activity Title: Building Foundations Indefinite Delivery Indefinite Quantity
Contract and Architecture and Engineering Services Contract
IEE Prepared by: Orna Dickman
Date: May 23, 2016

1. Background and Activity Description

Increased access to improved public infrastructure is a critical foundation for social and economic development. The public infrastructure required to support an independent, sovereign, viable Palestinian state is lacking or in need of repair or replacement. The existing infrastructure perpetuates poor and deteriorating public services and slows economic growth. Breaks in water mains and water pump failures, and leaks in sewage collection pipes occur frequently due to deteriorated water and sewer systems, and road infrastructure has deteriorated. This situation has developed over many years of population growth, lack of proper maintenance, and inadequate investment.

Building on the success of previous infrastructure programs, USAID intends to continue to build the infrastructure required for a viable Palestinian state. The Palestinian Authority (PA) recognizes the need to address infrastructure deficiencies. The PA's National Development Strategy 2014-16 *State Building to Sovereignty* states that the provision of quality public infrastructure plays a critical role in delivering fundamental human rights to Palestinians. The strategy calls for sustainable and equitable Palestinian infrastructure that contributes to promoting economic development, independence, social justice, and connectivity.

The following sections will review the state of infrastructure development in key areas, describe USAID's previous assistance and then discuss the proposed involvement under Building Foundations:

Roads

The road network in the West Bank is in poor or failed condition and many agricultural roads are beyond repair. Severe under-funding of road maintenance is a serious problem and road fatalities have increased as a result of poor road conditions. The extended travel time and increased transport costs impair economic growth in this area. Recognizing the needs in the road sector, USAID has reconstructed and repaired road infrastructure to provide means for safer travel, better access to services, and enhanced commerce by connecting numerous villages to nearby towns. Road projects have been completed in areas best suited for economic development and impact on local populations. Many of the roads rehabilitated have been key import-export routes

to and from border crossings. From internal roads throughout the West Bank to major city entrances and crossings, USAID's roads program has facilitated movement for Palestinians. Under existing infrastructure programs, USAID plans to develop and rehabilitate main and regional roads to form a contiguous road network that supports economic and social development. Some of these roads will extend through border crossings that serve as commercial crossing points between Israel and the West Bank.

Under Building Foundations, USAID plans to continue to rehabilitate severely damaged road segments that are presently unsafe for existing traffic levels and ensure that road development continues to address economic growth, movement and access in the West Bank, and, if conditions permit, in Gaza. Contractors will support construction efforts to include restoring or replacing damaged utility structures above and below the traveled roadway, including but not limited to water, wastewater, storm water, electricity, telephone and manholes of utilities located in the right-of-way and in the immediate vicinity of the roads.

Water Supply

Inefficient and insufficient potable water distribution systems result in low consumption rates and a lack of potable water to support economic growth and general welfare of the population. Approximately five percent of Palestinian households still have no access to running water. Many localities that do have running water consume water below the World Health Organization recommended personal consumption rate. During the summer months some villages receive no water at all. Low-income groups must purchase tankered water at inflated prices. In response, USAID has financed large-scale well-drilling and water pipeline distribution projects throughout the West Bank and Gaza.

Additional assistance is required to increase water production, improve the quality of water, reduce water losses from leaking pipelines, and connect the population that is still without piped water. Over the course of the next seven years, USAID plans to rehabilitate and construct water storage and distributions systems, and develop new water sources consistent with water conservation efforts and the rational development of underground aquifers. Contractors will work in close coordination with and assistance to the Palestinian Water Authority (PWA) to ensure that water resources are strategically exploited based on sound science and geographical need.

Sanitation

Untreated wastewater continues to pose an increasing health hazard. Only a small percentage of wastewater is collected in the West Bank and most of this is not properly treated. Raw sewage currently flows to the valleys causing local health problems and the potential for long-term contamination of the eastern and western aquifers, impacting future water supply options for both Palestinians and Israelis. Poor treatment facilities and lack of repair have led to the pollution of beaches and aquifers. USAID has rehabilitated and expanded sewage collection systems and upgraded sanitation systems at schools, health clinics, and other public facilities.

If the funding and political environments are optimal, USAID may address immediate needs in this sector in order to improve basic health conditions of the Palestinian population and protect the aquifers from being further contaminated. Contractors will support design and construction programs that may include pumping stations, conveyance pipelines, wastewater treatment facilities, wastewater reuse, storage, and distribution projects.

Other Infrastructure

Funds permitting, USAID will construct or upgrade other infrastructure to support programs in the education, health, energy, governance, and private sectors. Activities may include, but are not limited to, the construction of structures and buildings such as border crossings, courthouses, youth centers, schools, clinics, hospitals, renewable and other power stations, solid waste facilities, and other government and municipal buildings.

Training, Operation and Maintenance, and Institutional Capacity Building

The provision of infrastructure requires that Palestinian institutions develop the internal capacity to manage, operate, maintain, expand and finance key infrastructure in order to protect valuable infrastructure investments and reduce dependency on international donor funding. USAID has previously supported capacity building for operation and maintenance of water and road facilities in the West Bank. USAID has also provided capacity building to grantees and contractors to ensure that stringent requirements related to safety and quality are met. Additional institutional capacity building efforts are necessary in order to protect investments in the sector and ensure safe water supplies.

Bulk water supply projects require major operational and maintenance assistance. Also, medium-term investment and planning can improve the capacity of the PWA and municipal water offices. Benefits must extend to small villages, perhaps through cooperative "Joint Service Councils." Building Foundations interventions may include: 1) restoring wells and accompanying Operation and Maintenance systems, 2) involving the private sector to perform normal maintenance and repairs, 3) establishing regional technical centers, 4) making sophisticated municipal technicians available to small villages, 5) training operations and maintenance staff, and 6) developing skilled water supply technicians through vocational training centers.

Under Building Foundations, USAID will work with the PWA to improve its regulatory capacity. If funds are sufficient, USAID will also work with other relevant ministries, communities, and the private sector to promote more effective wastewater reuse and ensure cleaner water supplies through watershed management, environmental pollution control and remediation, and improved solid waste management. Contractors will support USAID in building capacity in the Palestinian Authority and municipalities to undertake road maintenance on a regular basis. USAID will continue to assist the Ministry of Public Works and Housing (MPWH) to establish sustainable road maintenance unit, the PWA on issues relating to water management, other Palestinian entities, as well as grantees and contractors.

Studies and Assessments

Numerous infrastructure sector assessments have been completed by donors and the PA in recent years. USAID recently completed a road economic study that identified the financial requirements for conducting maintenance, as well as possible revenue sources; a Hebron industrial zone discharge study; a road cost-benefit analysis; and a number of environmental reviews. The A&E firm and construction contractors will assist in completing additional assessments and studies, and/or perform ad hoc studies in the infrastructure sector. Impact assessments of USAID-funded infrastructure are required as well in order to assess the economic benefit of water and roads and other infrastructure projects funded by USAID.

Coordination

The Architecture and Engineering firm will coordinate with (1) the MPWH for road rehabilitation and construction; (2) the PWA for water supply and sanitation facilities; and (3) other PA ministries and organizations on education, health, energy and other facilities.

Recommended Determination and Mitigation Actions

Categorical Exclusion

Activities that will be carried out under the A&E Contract are recommended for Categorical Exclusion, as they meet the criteria stated in 22 CFR 216.2 (c)(1)(i) (*"The action does not have an effect on the natural or physical environment"*) and fall entirely within at least one of the categories qualified for Categorical Exclusion according to USAID's environmental regulations in 22 CFR 216.2 (c)(2)(i),(iii)&(v). These activities are anticipated to include the following:

- Provide professional services of an architectural or engineering nature, which are required to be performed or approved by a person licensed, registered, or certified to provide those services.
- Prepare feasibility studies, master plans, conceptual designs specifications, and final designs.
- Conduct environmental reviews and prepare mitigation measures and Environmental Assessments in accordance with 22 CFR 216.
- Assist USAID in pre-qualification of construction contractors.
- All aspects of construction management during the construction phase of assigned projects.
- Provide professional services of an architectural or engineering nature, or incidental services, that members of the architectural and engineering professions (and individuals in their employ) may logically or justifiably perform, including studies, investigations, surveying and mapping, tests, evaluations, consultations, comprehensive planning, program management, conceptual designs, plans and specifications, value engineering, construction phase services, soils engineering, design drawings reviews, peer reviews,

preparation of operating and maintenance manuals, and other related services. Planning, design, and training for water resource management, urban and rural water systems, wastewater treatment reuse, drinking water disinfection, watershed management systems, alternative water treatment systems, improvement of water quality, drainage basins and irrigation systems, dams and storage reservoirs, flood control programs, and the exploration and development of groundwater resources.

- Plan, design, train, manage, etc., activities pertaining to domestic and industrial water supply; water distribution systems; wastewater collection, treatment and disposal techniques; wastewater recycling, materials reuse; coastline erosion and flood control, natural wells, storm water drainage; proper solid waste collection, recycling, and disposal, and recommendations for effective operation and maintenance.
- Review, approve, and keep the implementation schedule updated for awarded construction projects.
- Design civil works structures such as roads, ports, railroads, and bridges; building and support structures related to industrial parks and industrial clustering areas; supply chain management infrastructure design; waste/energy minimization strategies; design green buildings and sustainable construction; construction design concepts including materials/technology selection; site planning and management, and demolition techniques.
- Design power generation activities from alternative sources, i.e., wind, flowing water, hydropower, biofuels, solar, biogas, and other clean sources.
- Provide alternative financing, capacity building and training specific to the construction, rehabilitation and/or reconstruction of water, sanitary and solid waste management systems, IT systems; roads, shipping and transportation systems, power matrixes, tariff studies, cost recovery systems, and analysis of public- private partnerships; whole-life-cycle performance and costing; procurement needs; water concession design and tariff structure.
- Quality assurance services to supervise the construction contractors' quality control services and assure that, at a minimum, industry quality control standards are met, and that the highest quality results are obtained.
- Establish the construction management plan. Review of construction contractors' work plans, budgets and schedules, including quality control plan.
- Safety program monitoring.
- Prepare an Engineer's confidential cost estimate.
- Hold pre-bid meetings and issue meeting minutes as well as drafting any necessary addenda and responses to bidder questions.
- Assist USAID in reviewing proposals and draft recommendations for award.
- Verify construction contractor mobilization including recommendations to USAID for approval of work schedule and issuance of notice to commence.
- Hold pre-construction meetings and prepare meeting minutes.
- Verification and implementation of QA/QC plans.

- Provide services during construction to ensure works are executed in accordance with the contract between USAID and the construction contractor.
- Advise USAID of possible situations (technical, legal, political or otherwise) and contractor actions that may adversely impact project implementation, and do everything within the construction management contractor's power to avert anticipated detrimental impacts on the project.
- Provide site staff and home office support to administer construction works as required to ensure proper performance of the construction contractor.
- Review and approve construction contractor's shop drawings for products and facilities to be incorporated into the permanent works.
- Review and approve construction contractors' submittals as required by the construction contract.
- Maintain project construction records, and issue on behalf of USAID correspondence, certificates, notices and instruction to construction contractors as may be required by the provisions of the construction contract documents.
- Promptly examine and prepare recommendations regarding construction contractor claims for extensions of time, payment for extra work and other similar matters, and negotiate with contractors on the rates (if not agreed upon during the solicitation stage) for any unscheduled items or work that arise and submit recommendations on these to the Employer.
- Review/approve construction contractor payment vouchers prior to submitting to USAID for approval. The construction management contractor shall certify that the completed works have been carried out in accordance with the requirements of the contract or indicate any of the works that have not been carried out.
- Submit weekly highlights and monthly site reports indicating the progress of work. The reports shall describe the value of works completed, problems that may require the employer's attention, construction contractor's performance, whether works completion may be advanced or delayed, and whether circumstances have materially affected the contract cost. The report shall also include, but not be limited to, test result documentation, actions taken by the construction management contractor, claims, approvals, measures for the Environmental Assessment mitigation issues, and project progress photos.
- Verify warranties of all equipment and system guarantees.
- Upon completion of work, the construction management contractor will review, certify, and deliver construction contractor "as-built" drawings as well as other documentation required in the contract.
- Prepare the Operation and Maintenance (O&M) manuals as necessary. This activity must be completed before handing over to the employer.
- Carry out the necessary inspections and shortly before the end of the construction period determine the remaining works to be completed and, when these are satisfactorily completed, issue certificates of substantial or final completion to the employer.

- Ensure that the construction contractor implements the mitigation measures cited in the EMMP and in the Environmental Assessment and include this in the monthly report as well as the final project report.
- Provide services related to disputes over pre-qualification, bid protests, bid rejection and re-bidding of the Contract for Construction.
- Provide support services for participation in litigation or alternative dispute resolution of claims.
- Preparation for and serving as a witness in connection with any public or private hearing or other forum related to the project. Services to support, prepare, document, bring, defend, or assist in litigation undertaken or defended by USAID.
- Provide inspection services during the Defects Liability Period to verify acceptable completion of all work per contract specifications for proposed construction activities and ensure project contract close-out.
- Monitoring the protection and preservation of cultural resources and archaeological artifacts.
- Provide a security management plan indicating the understanding of the security situation and accommodating or counteracting the disruption resulting from the security situation.
- Miscellaneous and supplemental services related to the project as requested by USAID. Provide any additional engineering and construction management support to USAID that is not mentioned in the above general description of service.
- Work with the Palestinian Water Authority, West Bank Water Department, Joint Services Councils, local governments, the private sector, non-governmental organizations, community groups, and other stakeholders to strengthen delivery, operation, and maintenance of key water and wastewater services in the West Bank.
- Provide training to the Palestinian Water Authority, West Bank Water Department, Joint Services Councils, and local governments in order to repair, maintain, and expand water and wastewater infrastructure (wells, pumps, distribution and collection networks, water treatment and wastewater treatment plants).
- Advise USAID of possible situations technical, legal, political or otherwise) and contractor actions that may adversely impact project implementation, and do everything within the construction management contractor's power to avert anticipated detrimental impacts on the project.
- Host periodic construction meetings and additional meetings if needed to resolve issues impacting cost and schedule.
- Inform USAID, in writing, of all issues that may affect the project and suggest methods of resolution.
- Review construction contractor payment invoices and make associated recommendations for payment to USAID.
- Develop construction specifications, drawings, special conditions, and cost estimates for projects to be designed under this contract; provide general and specialized support in the preparation of solicitation documents for the procurement of construction services; conduct environmental reviews and prepare mitigation measures and environmental

assessments in accordance with 22 CFR 216; and monitor, protect, and preserve cultural resources and archeological artifacts in the design and implementation of projects.

Pursuant to 22 CFR 216.2 (c)(2), the above actions are categorically excluded from further environmental review. As per 22 CFR 216 (c)(1) an initial environmental examination or environmental assessment are not required.

Negative Determination with Conditions

Construction activities will be identified during the planning stage. It is anticipated that these activities might include activities such as water distribution systems, storm water and wastewater collection systems, wastewater treatment and reuse systems, roads rehabilitation, building construction, border crossings, security installations, and other infrastructure projects.

At this stage of program development, the size and location of construction activities is not well defined. An Environmental Assessment Screening Process shall be conducted for each proposed activity to determine the environmental consequences. If the Environmental Assessment Screening Process concludes that the activity will not have a "significant" effect on the environment, mitigation and control measures to minimize/eliminate any adverse impacts shall be developed. A Negative Determination with Conditions will ensure that appropriate attention and mitigation measures are followed to eliminate any adverse impacts on the natural or physical environment. The conditions are that the implementer of the program (the A&E firm) shall perform Environmental Assessment Screening Process for each activity (using the attached Environmental Documentation Form), and develop appropriate mitigation and control measures (using the attached EMMP template) to mitigate any possible adverse impacts during the construction or operation stages. This process shall start as early as possible in the planning and design stages and shall be prepared by the A&E firm.

Mitigation measures shall include, but not be limited to, the following:

- Apply best management and good engineering practices, and incorporate environmentally sound design principles.
- Develop appropriate dust, noise, and waste control measures. Mitigation measures shall be developed to eliminate/reduce any health, noise, pollution, or any other negative impacts as a result of activities related to excavation, construction, demolishing, etc. Final disposal of waste (including waste generated as a result of excavation) shall be transferred to appropriate and approved locations. Top rich soils shall not be wasted.
- Use of appropriate health and safety measures to protect the health and safety of both workers and the general public.
- Protect archeological and cultural heritage sites.
- Protect water sources from any contamination.

- Protect rare species.
- Appropriate storage locations for construction material and construction equipment taking into consideration health, safety, and nuisance issues.
- Appropriate storage for hazardous construction material.
- Adaptation of sustainable agricultural principles.

The Environmental Document Form and the mitigation measures shall be approved by the Contracting Officer's Representative and the Mission Environmental Officer (MEO) before proceeding with construction.

It is anticipated that the majority of the construction activities will fall under this category (Negative Determination with conditions).

Positive Determination

If the Environmental Assessment Screening Process concluded that an activity might have a "significant" effect on the environment, a Scoping Statement and a detailed Environmental Assessment shall be carried out in accordance with procedures outlined under 22 CFR 216.3(a)(4) and 22 CFR 216.6. The MEO will determine which activities qualify for Positive Determination.

In addition, activities which are large-scale or on new lands (undeveloped lands) and wastewater treatment facilities (and all activities as described under 22 CFR 216.2(d)(1)) qualify for a Positive Determination pursuant to 22 CFR 216.3 (a)(2)(iii), and require a Scoping Statement and a detailed Environmental Assessment (to be prepared in accordance with procedures outlined under 22 CFR 216.3 (a) (4) and 22 CFR 216.6).

Scoping Statements and Environmental Assessments shall be conducted and prepared with stakeholder consultations and inputs, and shall be approved by the BEO prior to any construction.

Pesticides

As planned, this program will not support procurement of pesticides. However, if during implementation a need was identified to support procurement (including training) of pesticides, the implementer shall prepare a Pesticides Evaluation Report and Safe Use Action Plan (PERSUAP) prior to any support (including training) for the procurement and/or use, or both of pesticides, for approval by the Bureau Environmental Officer (BEO). The PERSUAP shall be prepared in accordance to procedures prescribed in 22 CFR 216.3(b)(1)(i) through (v). PERSUAP shall be prepared by a PERSUAP professional- the list of such persons is maintained by the BEO.

Compliance

To ensure compliance with USAID environmental procedures, the Contracting Officer's Representative responsible for managing this program will be responsible for periodic monitoring of the environmental aspects and compliance of this program. Routine visits by the Contracting Officer's Representative will be conducted. The Contracting Officer's Representative will be responsible for all documentation and records related to environmental compliance.

Revisions

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that any of the proposed actions to be funded by this activity might be "major" and their results "significant," the threshold decision for those actions listed above will be reviewed and revised by the Mission Environmental Officer, and an environmental assessment prepared as appropriate.

Environmental Mitigation and Monitoring Plan (EMMP)

- An EMMP should either be included in or developed for (1) all IEEs that have at least one —Negative Determination with Conditions|| (or for activities for which an environmental review has been completed pursuant to an IEE requirement) and (2) all Environmental Assessments (EAs).
- If the EMMP is not developed as part of the IEE, the implementing partner should usually lead development of the EMMP, subject to review, concurrence and oversight by the AOTR/COTR with MEO assistance.
- In all cases, the tasks identified in the EMMP are incorporated into the implementing partner's Work Plan, budget, and reporting.
- All phases of the project should be considered.

The following is a sample EMMP format, it can be adapted, as necessary.

Environmental Mitigation and Monitoring Plan

Activity Title:

Implementing Partner:

Activity	Impact	Mitigation Measure(s)	Monitoring Indicator(s)	Monitoring and Reporting Frequency	Party(ies) Responsible
List all activities in IEE that received a —negative determination with conditions. Do not list any other activities in separate rows.		If mitigation measures are well-specified in the IEE, quote directly from IEE If they are not well-specified in the IEE, define more specifically here.	Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)	For example: —monitor weekly, and report in quarterly reports. If XXX occurs, immediately inform USAID activity manager.	If appropriate, separately specify the parties responsible for mitigation, for monitoring and for reporting.



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Environmental Documentation Instructions

Note

These instructions accompany the Environmental Documentation Form for activities under the Building Foundations project and will be prepared by the Architecture and Engineering firm during the planning and design stage.

Who must submit environmental documentation?

This form is required for each activity sponsored by USAID under Building Foundations, aside from those activities that USAID has determined, in writing, to warrant Categorical Exclusions from environmental compliance procedures.

Step 1. Provide requested "Applicant Information" (Section A of the form)

Step 2. List all components in the activities

In Table 1 (Section B) of the form, list all activities associated with the activities. Include all phases: planning, design, construction, operation & maintenance. Include ancillary activities. (These are activities that are required to build or operate the primary activity. Examples include building or improving a road to provide heavy vehicles access to the project site, excavation of fill material or gravel for construction, laying utility pipes to connect with energy, water sources or sewage disposal.)

Step 3. Screening: Identify low-risk and high-risk activities

For *each* activity listed in Table 1, refer to the list of examples below to determine whether it is very low-risk, high risk, or moderate risk. (Activities which do not appear in either the low-risk or the high-risk list are considered moderate risk by default). Enter the results in Table 1.

Very low-risk activities (§216.2(c)(2))	High-risk activities (§216.2(d)(1))
<p>Provision of education, technical assistance, or training. (Note that activities directly affecting the environment do not qualify)</p> <p>Community awareness initiatives.</p> <p>Controlled experimentation exclusively for the purpose of research and field evaluation confined to small areas and carefully monitored (when no protected or other sensitive environmental areas could be affected).</p> <p>Technical studies and analyses and other information generation activities not involving intrusive sampling of endangered species or critical habitats.</p> <p>Document or information transfers.</p> <p>Nutrition, health care or family planning. (a) some included activities could directly affect the environment (construction, water supply systems, etc.) or (b) biohazardous (esp. HIV/AIDS) waste is handled or blood is tested.</p> <p>Rehabilitation of water points for domestic household use, shallow, hand-dug wells or small water storage devices (when no protected or other sensitive environmental areas could be affected). Note that USAID guidance on potable water requires water quality testing for arsenic, coliform, nitrates and nitrites.</p> <p>Support for intermediate credit arrangements (when no significant biophysical environmental impact can reasonably be expected).</p> <p>Programs of maternal and child feeding conducted under Title II of Public Law 480.</p> <p>Food for development programs under Title III of P.L. 480, when no on-the-ground biophysical interventions are likely.</p> <p>Studies or programs intended to develop the capability of recipients to engage in development planning. (Activities directly affecting the environment do not qualify)</p>	<p>River basin or new lands development</p> <p>Planned resettlement of human populations</p> <p>Penetration road building, or rehabilitation of roads (primary, secondary, some tertiary) over 10 km length, and any roads which may pass through or near relatively undegraded forest lands or other sensitive ecological areas</p> <p>Substantial piped water supply and sewerage construction</p> <p>Major bore hole or water point construction</p> <p>Large-scale irrigation</p> <p>Water management structures such as dams and impoundments</p> <p>Drainage of wetlands or other permanently flooded areas</p> <p>Large-scale agricultural mechanization</p> <p>Agricultural land leveling</p> <p>Procurement or use of <u>restricted use</u> pesticides, or wide-area application in non-emergency conditions under non-supervised conditions</p> <p>Light industrial plant production or processing (sawmill operation, agro-industrial processing of forestry products)</p> <p>High-risk and typically not funded by USAID:</p> <p>Actions determined likely to significantly degrade protected areas, such as introduction of exotic plants or animals</p> <p>Actions determined likely to jeopardize threatened & endangered species or adversely modify their habitat (esp. wetlands, tropical forests)</p> <p>Conversion of forest lands to rearing of livestock</p> <p>Planned colonization of forest lands</p> <p>Procurement or use of timber harvesting equipment</p> <p>Commercial extraction of timber</p> <p>Construction of dams or other water control structures which flood relatively undegraded forest lands</p> <p>Construction, upgrading or maintenance of roads (including temporary haul roads for logging or other extractive industries) which pass through relatively undegraded forest lands.</p>

Step 4. Determine if you should write an environmental review

Examine the screening results as they are entered in Table 1.

- If ALL the sub-activities are "very low risk," then no further review is necessary. In Section C of the form, enter "categorical exclusion" as your recommended determination. Skip to Step 8 of these instructions.
- If ANY sub-activities are "moderate risk," you must list mitigation measures to be followed, and should consider completing an environmental review to address these activities. Proceed to Step 5. USAID may require an environmental review.
- If any sub-activities are high risk, note that Regulation 216 usually requires a full environmental assessment study (EA). Rather than commit to such a study, it is recommended that you complete

an environmental review addressing these activities to determine if a full EA will indeed be required. Because these activities are assumed to have a high probability of causing significant, adverse environmental impacts, they are closely scrutinized. *Any* proposed high-risk activity should be discussed in advance with USAID.

In some cases, it is possible that effective mitigation and monitoring can reduce or eliminate likely impacts so that a full EA will not be required. If the applicant believes this to be the case, the environmental review must argue this case clearly and thoroughly. Proceed to Step 5.

Step 5. Write the environmental review, if appropriate

The environmental review is a typically short, 2–3 page document. It follows the outline below. It presents the environmental issues associated with the activities. It also documents the mitigation and monitoring commitments made by the implementer. Its purpose is to allow the implementer and USAID to evaluate the likely environmental impacts of the project.

- A. **Summary of activity.** Summarize background, rationale and outputs/results expected. (reference to proposal, if appropriate).
- B. **Description of activities.** For all moderate and high-risk activities listed in Table 1 of the form, succinctly describe location, siting, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during construction and who will undertake them. (All of this information can be provided in a table). If various alternatives have been considered and rejected because the proposed activity is considered more environmentally sound, explain these.
- C. **Environmental Situation.** Describe the environmental characteristics of the site(s) in which these activities will take place. Focus on characteristics of the site that are of concern—e.g., water supplies, animal habitat, steep slopes, etc. Is the environmental situation at the site degrading, improving, stable with regard to these critical characteristics?
- D. **Evaluation of Activities and Issues with Respect to Environmental Impact Potential.** Include impacts that could occur before construction starts, during construction and during operation, as well as any problems that might arise with abandoning, restoring or reusing the site at the end of the anticipated life of the facility or activity.

Explain direct, indirect, induced and cumulative effects on various components of the environment (e.g., air, water, geology, soils, vegetation, wildlife, aquatic resources, historic, archaeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc.)

Indicate any beneficial impacts and how the sustainability of the natural resource base will be improved.

- E. **Environmental Mitigation and Monitoring Plan.** Provide a workplan and schedule identifying the following:

Mitigation measures. Identify the means taken to avoid, reduce or compensate for impacts. (For example, restoration of borrow or quarry areas, replanting of vegetation, compensation for any relocation of homes and residents.) If standard mitigation or best practice guidance exists and is being followed, cite this guidance.

Monitoring Indicate how mitigation measures will be monitored to ensure that they accomplish their intended result. If some impacts are uncertain, describe the monitoring which will be conducted to identify and respond to these potential impacts.

Responsible parties. Identify *who* will undertake mitigation and who will conduct the monitoring, and at what frequency.

- F. **Other Information.** Where possible and as appropriate, include photos of the site and surroundings; maps; or list the names of any reference materials or individuals consulted. (Pictures of the site can substantially reduce the written description required in parts B & C)

Step 6. Based on the environmental review, reach a recommended determination for each high-risk or moderate-risk activity

For each high-risk or moderate-risk activity, the environmental review will help you decide between one of three recommended determinations:

- **no significant adverse impacts.** The activity in question will not result in significant, adverse environmental impacts. Special mitigation or monitoring is not required. Typically does not apply to high-risk activities.
- **no significant adverse impacts given appropriate mitigation and monitoring** With appropriate mitigation and monitoring, none of the sub-activities will result in significant, adverse environmental impacts.
- **significant adverse impacts.** One or more of the sub-activities is likely to cause significant adverse environmental impacts and cannot be mitigated with best practices or other measures. A full environmental assessment will be required.

Enter these determinations in Table 1.

Step 7: Summarize recommended determinations

In section C of the form, summarize your recommended determinations by checking ALL categories indicated in Table 1.

Step 8. Sign certifications (Section D of form), attach mitigation measures or environmental review.

Step 9. Submit forms and supporting documents (including mitigation and monitoring measures) to USAID project officer (COR).



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Environmental Documentation Form

A. Applicant information

Title of Activity:	Parent project:
Activity (brief description):	Amount:
Individual contact and title:	Address, phone & email:
Location of activity:	Start and end date of activity:

B. Activities, screening results, and recommended determination

TABLE 1 Proposed Sub-activities	Screening result (Step 3 of Instructions)			Recommended Determinations (Step 4 of Instructions: Complete for all moderate and high risk activities)		
	Very Low Risk	Moderate Risk	High Risk	No Further Action Required	Further Action Required	Stop Activity
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						

(continue on additional page if necessary)

C. Summary of recommended determinations (check all that apply)

The activity contains. . .	<i>(equivalent regulation 216 terminology)</i>
<input type="checkbox"/> Very low risk sub-activities	<i>categorical exclusion(s)</i>
<input type="checkbox"/> After environmental review, sub-activities determined to have no significant adverse impacts	<i>negative determination(s)</i>
<input type="checkbox"/> After environmental review, sub-activities determined to have no significant adverse impacts, given appropriate mitigation and monitoring	<i>negative determination(s) with conditions</i>
<input type="checkbox"/> After environmental review, sub-activities determined to have significant adverse impacts	<i>positive determination(s)</i>

D. Certification:

I, the undersigned, certify that the information on this form is correct and complete

Name: (to be signed by the COP) _____

(Signature)

(Date)

BELOW THIS LINE FOR USAID USE ONLY

Approval

USAID Project Officer	(print name)	(signature)
<input type="checkbox"/> Approved		
<input type="checkbox"/> Rejected		
USAID MEO	(print name)	(signature)
<input type="checkbox"/> Approved		
<input type="checkbox"/> Rejected		

USAID comments: (if documentation is rejected, comments must be provided to applicant)